



Department of Toxic Substances Control



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January 31, 2003

Mr. Jerry Dunaway
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COMMENTS ON DRAFT SITE INSPECTION REPORT FORMER STORAGE AREAS ST-16A AND 16B FORMER MARINE CORPS AIR STATION (MCAS), TUSTIN, CALIFORNIA

Dear Mr. Dunaway:

The Department of Toxic Substances Control (DTSC) has completed its review of the Draft Site Inspection Report Former Storage Areas ST – 16A and 16B Former Marine Corps Air Station Tustin, California dated November 2002. The purpose of the report is to summarize previous investigations conducted at two former hazardous wastes storage sites ST 16A and 16B. The Navy found polycyclic aromatic hydrocarbons (PAH) in soils in earlier investigations at these two sites. They completed a removal action of contaminated soils in 1997. Post-removal soil sampling found some additional contamination with PAHs. The subject report documents the Department of the Navy's (DON's) risk screening evaluation at the site and based on the risk estimates recommends a No Further Action (NFA) site closure for ST 16A and 16B.

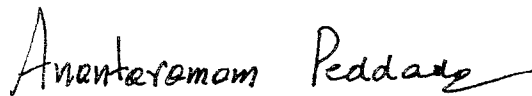
Based upon our evaluation of the sampling results, we do not concur with DON's conclusion that ST 16A and 16B support a NFA site closure. There are eight locations where the results indicate concentrations of benzo(a)pyrene equivalents [B(a)P] in excess of 1000 ug/kg. It is DTSC's conclusion that this renders the site unacceptable for residential use. DTSC does not agree leaving in place concentrations of benzo(a)pyrene equivalents [B(a)P] in excess of 1000 ug/kg. In previous instances DON removed "hotspot" areas (i.e. benzo(a)pyrene equivalents [B(a)P] in excess of 1000 ug/kg).

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.*

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DTSCs comments are provided in the enclosure. We look forward working with you to resolve these comments. If you have any questions regarding this letter, please contact me at (714) 484-5418.

Sincerely,

A handwritten signature in black ink that reads "Anantaramam Peddada". The signature is fluid and cursive, with the first name "Anantaramam" and the last name "Peddada" clearly distinguishable.

Anantaramam (Ram) Peddada
Remedial Project Manager
Base Closure and Reuse Unit
Office of Military Facilities

Enclosures

cc: Mr. James Ricks
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Mr. Jerry Dunaway
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COMMENTS ON DRAFT SITE INSPECTION REPORT FORMER STORAGE AREAS ST-16A AND 16B FORMER MARINE CORPS AIR STATION (MCAS), TUSTIN, CALIFORNIA

General Comments:

1. Overall, draft document is well written and comprehensive. And while DTSC, generally concurs with the DON's assessment for the risks estimates, DTSC reserves concern relative to whether or not the estimates support a finding of NFA site closure (See Specific comments)
2. Some of the references cited in the text are not referenced in the reference section and vice versa
3. Initial soil removal: To what depth the soil was removed? And how many tons of soil was removed and how it was disposed off?

Specific Comments:

1. Page i, Under Executive Summary: paragraph 3, line 3, add "6 were" before "analyzed for total petroleum hydrocarbons..."
2. Page i, Under Executive Summary: paragraph 3, lines 2-3, "8 soil samples..." were any of the samples collected at ST 16B? If not, why not?
3. Page i, Under Executive Summary: paragraph 3, line 6, provide in how many samples PAHs were detected above TCLs and also mention what is the target cleanup levels.
4. Page i, Under Executive Summary: paragraph 6, line 3, no removal action was conducted at ST16B.
5. Page 1-1, Under Introduction: paragraph 3, line 4, Regional Water Quality Control Board is also a part of CAL-EPA. Please revise the sentence.
6. Page 1-1, Under Introduction: paragraph 3, line 5, Delete "and SWDIV"
7. Page 1-1, Under Introduction: paragraph 4, line 1 and 2; please update these sentences with respect to the recent transfer of property to the City of Tustin.

8. Page 1-1, Section 1.2: We suggest deleting "Project Description" from the heading.
9. Page 2-1, Under Physical setting and Background: Paragraph 2, line 1, was ST-16B investigated?
10. Page 2-1, Under Geology: Paragraph 1, line 9, the reference cited 'USDA 1978" in the text is missing in the reference section.
11. Page 2-2, Under Surrounding Land Use and populations: Paragraph 1, lines 5-6, please verify the current reuse plan for this site.
12. Page 3-1, Under Initial Site Investigation of 1996: Paragraph 1, lines 3-4, please explain why only 6 samples were analyzed and no samples were collected at ST 16B.
13. Page 3-1, Under Initial Site Investigation of 1996: Paragraph 1, line 6, the reference cited '1996EPA" in the text is missing in the reference section.
14. Page 3-1, Under Initial Site Investigation of 1996: Paragraph 1, line 7, provide a table showing PRGs of PAHs, and where they were detected above the target cleanup levels.
15. Page 3-1, Under Additional Soil Sampling of April/May 2000: paragraph 1, lines 8-9, The Navy asserts that the source of elevated concentrations of PAH in soil was apparently runoff from the paved area which runs past both ST-16A and ST-16B. We note in Figure 3-1 that a total of eight of the 55 soil samples shown in Figure 3-1 have concentrations of benzo(a)pyrene equivalents (BAPEq) greater than 1,000 µg/kg. Six of these eight were collected at the edge of the paved area. The six samples mentioned are scattered along the entire length of the paved area shown in Figure 3-1. Therefore, we agree with the Navy that the paved area, not Sites 16A and 16B, is the probable source of most of the carcinogenic PAH in soils described in this report. The reason for the spatially intermittent pattern of the runoff of PAH-laden material is not known. DTSC does not agree leaving in place concentrations of benzo(a)pyrene equivalents [B(a)P] in excess of 1000 ug/kg. In previous instances DON removed "hotspot" areas (i.e. benzo(a)pyrene equivalents [B(a)P] in excess of 1000 ug/kg).

16. Page 3-2, Under Site Characterization: Paragraph 1, line 1, "soil samples collected during initial investigation of 1996 have been excluded". Please provide a table with the original 6 samples with their results for completeness and comparison.
17. Page 3-3, Fig. 3-1, even though 14 conformity samples were taken; only 11 sites show on figure 3-2. Please add the missing sample locations to the figure. Also please provide the original 1996 sample locations and the results to this figure.
18. Page 4-5, Under Risk Management Considerations: 4th bullet, please verify the current reuse plan for this site.
19. Page 6-1, Under References: To make it easy for this comment number the references as 1, 2...20. The following references are not referenced in the text: 4, 6, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, and 20.
20. Page 1 of 6, Table A-1: Please change the heading to "Analytical Results for Confirmatory Samples". Please explain the qualifiers, RDL and MDL at the end of the table.
21. Table A-2: Provide the reason why the samples Numbers 17306-738 and 17306-736 have no values. In addition a total 54 samples were collected according to table A-3, however only 50 sample results were presented in the table A-2. Please explain.
22. Table A-2: please add RDL, MDL, Units and Result Qlfr to the table.
23. Table A-3: Please provide Total B (a) P Equivalents for the first six samples which were shown as zeros.
24. Appendix B, Table B-1. page 2, please fix this page.